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March 30, 2020


Via ECF

Honorable Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Application granted.

SO ORDERED.

Re: *United States of America v. Joelsy Sarit-Abreu*
Ind. No.: 19 Cr. 367 (RA)



Ronnie Abrams, U.S.D.J.
3/30/20

Dear Judge Abrams:

Ms. Abreu is a proud member of the SDNY Young Adult Opportunity Program (YAOP). Ms. Abreu has a daughter named Jeslyn, who is three-years old. Presently, Jeslyn is with her father, Jesus Santos, in the Dominican Republic (DR). Jeslyn traveled there on February 16, and Mr. Santos was supposed to bring her back home on March 23. Since her visit, however, life has drastically changed as a result COVID-19 pandemic. Now, due to strict travel restrictions, Mr. Santos is prohibited from entering the US because he is not a US Citizen. The only feasible alternative is for Ms. Abreu to travel to the DR, pick up Jeslyn, and bring her back home. Needless to say, Ms. Abreu is very concerned for Jeslyn's well-being. Infections are rising in the DR, and she is extremely nervous that she is separate from her.

Ms. Abreu respectfully requests permission to travel to the DR as soon as possible to pick up Jeslyn and bring her back home. She expects the trip to take about 3-4 days. Additionally, Ms. Abreu seeks the return of her US Passport. She assures the Court that she will return the Passport to Pre-Trial Services (PTS) upon her return. The government has no objection. PTS Officer Rena Bolin indicates that PTS does not take a position on international travel, but that Ms. Abreu has been compliant and is doing well in the YAOP.

Thank you for your consideration.

Very truly yours,

SULLIVAN | BRILL, LLP



By: Steven Brill